

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

JUDY JIEN, et al.,

Plaintiffs,

v.

PERDUE FARMS, INC., et al.,

Defendants.

C.A. No. 1:19-CV-2521-SAG

**JOINT STIPULATION AND
[PROPOSED] ORDER AMENDING
INTERIM SCHEDULING ORDER**

The Plaintiffs and Defendants in the above-captioned matter (collectively, the “Parties”), by and through their undersigned counsel and pursuant to Local Rule 105.9, on this 21st day of January 2022, recite and stipulate as follows:

WHEREAS, on December 17, 2021, Plaintiffs filed a Motion for Leave to File a Third Amended Consolidated Complaint (“Original Motion to Amend”) and a Motion for Leave to File Under Seal Plaintiffs’ Memorandum of Points and Authorities in Support of Their Motion for Leave to File Third Amended Consolidated Complaint (“Original Motion to Seal Amended Complaint”), *see* ECF Nos. 544, 546;

WHEREAS, on December 17, 2021, Plaintiffs also filed a Motion for Leave to File Under Seal Plaintiffs’ Memorandum in Support of Motion for Preliminary Approval of Settlement with WMS and Peco Defendants (“Preliminary Approval Sealing Motion”), *see* ECF Nos. 547, 549;

WHEREAS, on December 30, 2021, the Court approved the Parties’ stipulation amending the Interim Scheduling Order in the above-captioned matter to establish a briefing schedule for the Original Motion to Amend, Original Motion to Seal Amended Complaint, and Preliminary Approval Sealing Motion, *see* ECF Nos. 556, 557;

WHEREAS, on January 20, 2022, Plaintiffs filed a Notice of Withdrawal of Motion for Leave to File Third Amended Consolidated Complaint, in which the Plaintiffs withdrew the Original Motion to Amend, *see* ECF No. 566;

WHEREAS, on January 20, 2022, Plaintiffs also filed an Amended Motion for Leave to File Third Amended Consolidated Complaint (“Amended Motion to Amend”) and a Motion for Leave to File Under Seal Plaintiffs’ Memorandum of Points and Authorities in Support of Their Amended Motion for Leave to File Third Amended Consolidated Complaint (“Amended Motion to Seal Amended Complaint”), *see* ECF 567, 569;

WHEREAS, Plaintiffs provided Defendants with specific proposed redactions to (1) the exhibits attached to the Memorandum in Support for Preliminary Approval of Settlement with WMS and Peco Defendants on December 23, 2021 and (2) Plaintiffs' memorandum in support of their Amended Motion to Amend and the attached exhibits on January 20, 2022;

WHEREAS, under the revised Interim Scheduling Order, Defendants were to file any opposition to the Original Motion to Amend, Original Motion to Seal Amended Complaint, and/or Preliminary Approval Sealing Motion by January 24, 2022, and Plaintiffs were to file any reply to any such opposition by February 18, 2022, *see* ECF Nos. 556, 557;

WHEREAS, the Parties have had productive dialogue on these issues;

WHEREAS, the Parties have agreed that the deadline for Defendants to file any oppositions to the Amended Motion to Amend, the Amended Motion to Seal Amended Complaint, and the Preliminary Approval Sealing Motion should be extended to February 4, 2022;

WHEREAS, the Parties have agreed that, to the extent Defendants elect to file such oppositions, Defendants will file one consolidated brief opposing the Amended Motion to Amend and a second consolidated brief opposing both the Amended Motion to Seal Amended Complaint and the Preliminary Approval Sealing Motion;

WHEREAS, the Parties have agreed that the deadline for Plaintiffs to file any replies to any oppositions to the Amended Motion to Amend, the Amended Motion to Seal Amended Complaint, and the Preliminary Approval Sealing Motion should be extended to March 4, 2022;¹

¹ The Parties had originally agreed to a February 3, 2022 deadline for filing oppositions to the Amended Motion to Amend, the Amended Motion to Seal Amended Complaint, and the Preliminary Approval Sealing Motion and a March 3, 2022 deadline for filing replies in support of those motions. However, the Parties subsequently further met and conferred and agreed to push both deadlines back by one day.

WHEREAS, the Parties have agreed that Plaintiffs will file one consolidated brief replying to any opposition to the Amended Motion to Amend and a second consolidated brief replying to any opposition to the Amended Motion to Seal Amended Complaint and the Preliminary Approval Sealing Motion;

THE PARTIES STIPULATE AND AGREE that (1) Defendants will file any oppositions to the Amended Motion to Amend, the Amended Motion to Seal Amended Complaint, and the Preliminary Approval Sealing Motion no later than February 4, 2022; (2) to the extent Defendants elect to file such oppositions, Defendants will file one consolidated brief opposing Plaintiffs' Amended Motion to Amend and a second consolidated brief opposing both the Amended Motion to Seal Amended Complaint and the Preliminary Approval Sealing Motion; (3) Plaintiffs will file any replies to those oppositions no later than March 4, 2022; and (4) Plaintiffs will file one consolidated brief replying to any opposition to the Amended Motion to Amend and a second consolidated brief replying to any opposition to the Amended Motion to Seal Amended Complaint and the Preliminary Approval Sealing Motion.

Dated: January 21, 2022

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on January 21, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice to counsel for all parties that have appeared in this case.

/s/ Brent W. Johnson

IT IS SO ORDERED.

DATED: _____

United States District Judge Stephanie A. Gallagher